

**MARGARET CRAIG, as next of kin and personal representative of the estate of Angela Hulsey,**

**V.**

## Defendants.

[illegible]

## JURY DEMAND

Case 3:17-cv-01335 Document 31 Filed 02/23/18 Page 1 of 4 PageID #: 139

2. Defendant Rakes requested medical leave pursuant to the Family Medical Leave Act ("FMLA") which effectively began to run October 1, 2016. (Declaration of Keith Rakes, ¶ 5, Exhibit B, FMLA Request).

**RESPONSE:**

3. Defendant Rakes did not work from the date of his injury until his return to work on December 14, 2016. (Declaration of Keith Rakes, ¶ 8, Collective Exhibit C, Timesheets).

**RESPONSE:**

4. During Defendant Rakes medical leave from work, on or about October 6, 2016, Ms. Hulsey was a pre-trial detainee being held by the Cheatham County Sheriff's Office. (Complaint, ¶ 5.1).

**RESPONSE:**

5. On October 12, 2016, Ms. Hulsey became unresponsive and was taken by ambulance to Skyline Medical Center. (Complaint, ¶ 5.7).

**RESPONSE:**

6. Ms. Hulsey passed away two weeks later, on October 26, 2016.  
(Complaint, ¶ 5.10).

**RESPONSE:**

7. On January 13, 2017, Defendant Rakes resigned his employment with Cheatham County effective January 25, 2017. (Declaration of Keith Rakes, ¶ 9).

**RESPONSE:**

8. At no time did Defendant Rakes authorize County Attorney Bligh to accept service of process on his behalf. (Declaration of Keith Rakes, ¶ 10).

**RESPONSE:**

9. To date, Defendant Rakes has never been served with process in this case.  
(Declaration of Keith Rakes, ¶ 10).

**RESPONSE:**

Respectfully submitted,

/s/Robyn Beale Williams

Robyn Beale Williams, BPR #19736

Cassandra M. Crane, BPR 034889

**FARRAR & BATES, LLP**

211 Seventh Avenue North, Suite 500

Nashville, Tennessee 37219

(615) 254-3060

(615) 254-9835 Fax

[robyn.williams@farrar-bates.com](mailto:robyn.williams@farrar-bates.com)

[cassandra.crane@farrar-bates.com](mailto:cassandra.crane@farrar-bates.com)

*Counsel for Defendants Mark Bryant,*

*Stephanie Gizzi-Bell, Ben Moore, and*

*Keith Rakes*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 23<sup>rd</sup> day of February 2018, a true and correct copy of the foregoing has been forwarded via the Court's electronic notice system to:

James Bryan Moseley  
**MOSELEY & MOSELEY**  
Attorneys at Law  
237 Castlewood Drive, Suite D  
Murfreesboro, Tennessee 37129  
Phone: 615-254-0140  
Fax: 615-244-2270  
*Counsel for Plaintiff*

Raymond T. Throckmorton, III  
2016 8<sup>th</sup> Ave. South  
Nashville, TN 37203  
Phone: 615-297-1009  
Fax: 615-297-9007  
*Counsel for Plaintiff*

Terrance E. McNabb  
1018 Industrial Road, Suite 104  
Pleasant View, TN 37146-7198  
Phone: 615-746-2121  
*Counsel for Plaintiff*

Brent S. Usery  
**SPICER RUDSTROM, PLLC**  
Bank of America Plaza  
414 Union Street, Suite 1700  
Nashville, Tennessee 37219  
*Counsel for Defendant Jessica Plank*

Kelly M. Telfeyan  
**DICKINSON WRIGHT PLLC**  
424 Church Street, Suite 800  
Nashville, TN 37219  
*Counsel for Defendant Cheatham  
County*

/s/ Robyn Beale Williams

Robyn Beale Williams